

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

CONNECTOR CASTINGS, INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 4:15-cv-01148-TCM
	)	
ARSHON SILICON TECHNOLOGIES,	)	<b><u>JURY TRIAL DEMANDED</u></b>
INC. et al,	)	
	)	
	)	
Defendants.	)	

**JOINT PROPOSED SCHEDULING PLAN**

COME NOW the parties, by and through their attorneys of record, and hereby submit the following Joint Proposed Scheduling Plan pursuant to the Court's Order Setting Rule 16 Scheduling Conference dated August 11, 2015 [Doc. #: 13]:

(a) Track Assignment: The parties agree that **Track 2 (Standard)** assignment is appropriate.

(b) Deadlines for Joinder of Additional Parties and Amendment of Pleadings: All motions to join additional parties or to amend the pleadings must be filed by **November 23, 2015**.

(c) Discovery Plan:

i) The disclosure or discovery of electronically stored information shall be handled by the parties on an ongoing basis, as necessary, based upon the availability and/or existence of electronically stored information, if any. The parties agree to produce documents in TIFF or PDF format and intend to work cooperatively on any issues that may arise.

ii) The parties will comply with Federal Rule of Civil Procedure 26(b)(5) (as

amended, effective Dec. 1, 2015) with respect to the assertions of claims of privilege or protection of trial preparation material after production.

iii) The parties shall make their initial disclosures as required under Federal Rule of Civil Procedure 26(a)(1) by **October 9, 2015**.

iv) Discovery need not be conducted in phases or limited to certain issues.

v) Plaintiff shall make the disclosure of its expert witnesses pursuant to Federal Rule of Civil Procedure 26(a)(2) no later than **January 25, 2016**, and any depositions of Plaintiff's experts shall be completed by **February 22, 2016**. Defendants shall make their disclosure of experts witnesses pursuant to Federal Rule of Civil Procedure 26(a)(2) no later than **March 7, 2016**, and any depositions of Defendants' experts shall be completed by **April 4, 2016**.

vi) At this time, the parties believe that the presumptive limits of ten depositions per side and twenty-five interrogatories per party should apply.

vii) The parties do not anticipate conducting physical or mental examinations pursuant to Federal Rule of Civil Rule 35.

viii) All discovery shall be completed by **July 14, 2016**.

(d) **Alternative Dispute Resolution**: The parties believe that referral of this action to Alternative Dispute Resolution (mediation) may be useful and believe that a referral after **January 30, 2016** would be most productive.

(e) **Class Certification Motion**: The parties propose that Plaintiff's motion for class certification and all memorandum and supporting materials must be filed no later than **April 25, 2016**; opposition briefs shall be filed no later than **May 23, 2016**; and any reply brief may be filed no later than **June 6, 2016**. If either party desires an evidentiary hearing, the party must so request on or before May 23, 2016, and shall identify all grounds therefor.

(f) Dispositive Motions: The parties propose that any motions to dismiss, motions for summary judgment, motions for judgment on the pleadings or, if applicable, any motion to exclude testimony pursuant to *Daubert v. Merrell Dow Pharm., Inc.*, 509 U.S. 579 (1993) or *Kuhmo Tire Co. Ltd v. Carmichael*, 526 U.S. 137 (1999), must be filed no later than **July 25, 2016**. Any response shall be filed no later than **August 24, 2016**. Any reply shall be filed no later than **September 7, 2016**. In the event dispositive motions are filed prior to the above specified date, the opposing party shall file a response thirty days after the filing of the dispositive motion. A reply may be filed fourteen days after the filing of the response. Briefing of such motions shall be governed by E.D.Mo. L.R. 7-4.01.

(g) Trial Date and Estimated Length of Trial: The parties expect this matter to be ready for a one-week jury trial on **January 9, 2017**.

Respectfully submitted,

**LEWIS RICE LLC**

By: /s/ Joseph E. Martineau

Joseph E. Martineau, #32397MO  
Edward T. Pivin, #64086MO  
600 Washington Avenue, Suite 2500  
St. Louis, Missouri 63101  
Telephone: (314) 444-7600  
Facsimile: (314) 612-2042  
jmartineau@lewisrice.com  
epivin@lewisrice.com

*Attorneys for Defendants Arshon Silicon  
Technologies, Inc. and Seyed-Maziar Hosseini*

**SCHULTZ & ASSOCIATES LLP**

By: /s/ Ronald J. Eisenberg

Ronald J. Eisenberg, #48674MO  
Robert Schultz, #35329MO  
Mary Schultz, #35285MO  
640 Cepi Drive, Suite A  
Chesterfield, MO 63005-1221  
Phone: (636) 537-4645  
Fax: (636) 537-2599  
reisenberg@sl-lawyers.com  
rschultz@sl-lawyers.com  
mschultz@sl-lawyers.com

*Attorneys for Plaintiff*